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June 26, 2013

BY HAND DELIVERY

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Residential Capital, LLC*, Case No. 12-12020 (MG) –
*Motion by Ally Financial Inc. and Ally Bank for an Order
Enforcing the Automatic Stay Pursuant to 11 U.S.C. §
362(A)(3) by (1) Enjoining Prosecution of Alter Ego and
Veil Piercing Claims in the Class Action Entitled Landon
Rothstein, et al. v. GMAC Mortgage, LLC, et al., and (2)
Declaring Such Claims Void Ab Initio* [Docket No. 2511]

Dear Judge Glenn:

We represent the Rothstein plaintiffs. At the status conference in this matter on June 12, 2013, the Court instructed the parties to confer on a schedule for supplemental briefing and a hearing date in July or August as to whether the Rothstein plaintiffs' claims against Ally Bank are direct or derivative.

We write to inform the court that the parties have conferred, but have been unable to reach agreement on a schedule.

We propose the following schedule: (i) any supplemental papers be filed by July 17, 2013; and, (ii) the matter be heard at the July 24, 2013 omnibus hearing.

Respectfully submitted,

/s/ Mark A. Strauss
Mark A. Strauss

cc. All Parties on Attached Service List Exhibit A

Exhibit A

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